

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

COUNCIL ON AMERICAN-ISLAMIC  
RELATIONS – MINNESOTA,  
LEAGUE OF WOMEN VOTERS OF  
MINNESOTA,

Plaintiffs,

v.

ATLAS AEGIS LLC, ANTHONY  
CAUDLE, JOHN DOES #1-10,

Defendants.

Civil Action No. 20-CV-2195  
(NEB/BRT)

**CONSENT MOTION TO ENTER  
CONSENT DECREE**

Plaintiffs Council on American-Islamic Relations—Minnesota and League of Women Voters of Minnesota (collectively, “Voter Organizations”), with the consent of Defendants Atlas Aegis LLC and its chairman Anthony Caudle (collectively, “Defendants”), ask this Court to approve their settlement in this action and issue the proposed Consent Decree. The Defendants support this motion.

The Voter Organizations’ complaint in this case alleges intimidation of voters under Section 11(b) of the Voting Rights Act of 1965, 52 U.S.C. § 10307(b). The proposed Consent Decree resolves all remaining issues in this lawsuit by subjecting Defendants to specified requirements through January 1, 2025. The proposed Consent Decree is within this Court’s jurisdiction, furthers the objectives of the Voting Rights Act of 1965, is consistent with applicable federal and state law, and imposes no unreasonable burdens on any third parties.

Therefore, the Voter Organizations ask this Court to sign and enter the decree as final judgment in this action.

**FOR PLAINTIFFS COUNCIL OF AMERICAN-ISLAMIC RELATIONS—  
MINNESOTA AND LEAGUE OF WOMEN VOTERS OF MINNESOTA:**

Date: February 3, 2021

By: /s/ Julia Dayton Klein

LATHROP GPM LLP

Julia Dayton Klein (MN Bar #0319181)  
Amy Erickson (MN Bar #0399215)  
500 IDS Center  
80 South 8th Street  
Minneapolis, MN 55402  
Telephone: 1.612.632.3153  
[julia.daytonklein@lathropgpm.com](mailto:julia.daytonklein@lathropgpm.com)  
[amy.erickson@lathropgpm.com](mailto:amy.erickson@lathropgpm.com)

FREE SPEECH FOR PEOPLE

Ronald Fein\*  
John Bonifaz\*  
Ben Clements\*  
1320 Centre Street, Suite 405  
Newton, MA 02459  
Telephone: (617) 244-0234  
[rfein@freespeechforpeople.org](mailto:rfein@freespeechforpeople.org)  
[jbonifaz@freespeechforpeople.org](mailto:jbonifaz@freespeechforpeople.org)  
[bclements@freespeechforpeople.org](mailto:bclements@freespeechforpeople.org)  
\*Admitted to D. Minn. *Pro Hac Vice*

*Attorneys for Plaintiffs*